

Shawn M. Lindsay  
shawn@jurislawyer.com  
JurisLaw LLP  
Three Centerpointe Drive, Suite 160  
Lake Oswego, OR 97035  
Telephone: (503) 968-1475

*Attorney for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

KATERINA B. EYRE, TIM FREEMAN,  
MAZAMA SPORTING GOODS,  
NATIONAL SHOOTING SPORTS  
FOUNDATION, and OREGON STATE  
SHOOTING ASSOCIATION,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, Attorney General  
of Oregon, and TERRI DAVIE,  
Superintendent of the Oregon State Police,

Defendants.

Case No. 3:22-cv-01862-IM

**DECLARATION OF KEVIN L CAMPBELL**

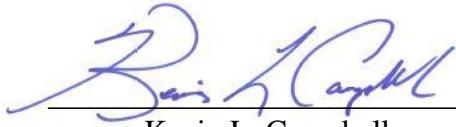
I, Kevin Campbell, declare and state the following.

1. I am a resident of Keizer, Oregon, am over 18 years of age, and have personal knowledge of the matters stated herein.
2. I am the Executive Director of the Oregon Association of Chiefs of Police (“OACP”), and am authorized to speak and testify on its behalf.
3. The OACP is a 501(c)(3) nonprofit corporation, dedicated to supporting Oregon police chiefs. There are 125 municipal police agencies that are members of OACP.
4. Measure 114 makes each police agency a “permit agent” for their respective jurisdictions.
5. At this time, OACP is working with the Oregon State Police (“OSP”) and the Oregon State Sheriffs Association to create a permit-to-purchase system that meets Measure 114’s requirements. But there is currently no system in place, and therefore no permits to purchase can be issued.
6. The permit to purchase system is modeled after Oregon’s existing concealed handgun licensing program. Municipal police departments have never had a role in issuing concealed handgun licenses in Oregon, and thus do not presently have the infrastructure, personnel or processes in place to accommodate this type of permit process. OSP estimated that there will be approximately 300,000 permits to purchase that need to be issued in the first year after Measure 114 takes effect. At this time, we believe that few if any of OACP’s 125 member agencies have sufficient staffing or resources to process and issue the applications and permits..
7. Measure 114 also requires permit-to-purchase applicants to provide proof of very specific training requirements that can be done online and through a live demonstration. The training requires that an applicant prove (1) they have been trained on both state and federal laws related to purchase, ownership, transfer, use and transportation of firearms; (2) that they have been trained on federal and state laws related to safe storage of firearms including reporting of lost and stolen guns; (3) that they have been trained in preventing the abuse or misuse of firearms, including the impact of homicide and suicide on families, communities and the country as a whole; and (4) that they are able to lock, load, unload, fire, and store a firearm before an instructor certified by a law enforcement agency. The first three requirements can be done online, but the fourth must be done in person. Measure 114 also allows an applicant to show proof of a completed course taken to get a concealed handgun license, provided that the course covers all four of the required components.
8. We are aware that the Oregon State Sheriffs Association is working on creating the training described above, and some of our member agencies have appointed subject matter experts to assist in that process; however, OACP believes that every person wishing to obtain a permit, including our law enforcement officers will first have to complete training that does not yet exist.

9. Many of our smaller agencies require new officers to purchase their own handguns for use as duty weapons. Those agencies do not have a current supply of handguns to provide to new officers, and new officers will be unable to purchase a handgun without first obtaining the required training and then obtaining a permit to purchase a firearm. This is likely to cause serious disruption to some of our member agencies whose officers cannot obtain the necessary firearms to perform their police duties.
10. At this moment, OACP believes that there is no way a permit system using municipal police departments as the permitting agents can be operational by December 8th.
11. I make these statements in support of the Plaintiffs' motion to preliminary enjoin Measure 114.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 2nd day of December 2022.



---

Kevin L. Campbell